



EWK CONSULTANTS INC.

ENVIRONMENTAL STUDIES

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Ms. Lorie Acker
Site Support & Inspection
U.S. Environmental Protection Agency
Sixth & Walnut Streets
Philadelphia, PA 19106

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Dear Ms. Acker:

Attached you will find two reports detailing the results of sampling conducted last year at the former State Road facility of Metal Bank of America.

The sampling was conducted under a court order obtained by the former operator of the site, Versatile Metals. The role that I and my contractor Versar played was simply to observe the sampling and accept custody of split samples obtained by Versatile's consultant, Woodward-Clyde (WCC). I also attempted to assure that the sampling was carried out in a manner that was protective of public health and the environment.

The following points should be noted:

- Versatile specified the sampling locations on site, presumably where they expected to find residual PCB contamination. The site was not randomly sampled.
- Versatile only took samples and analyzed soil materials which appeared contaminated. Thus, even at the non-random locations samples were not taken randomly. Indeed, WCC used a field PCB analysis technique to determine where and what to sample.

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- Versatile sampling procedures were poor. Cross contamination of samples is probable. This is more fully documented at page 10ff of the Versar report.

- The site is covered with asphalt. Versatile has contaminated the asphalt in certain locations, albeit at a low level, by its poor procedures. See p.16ff of the Versar report. It should be noted that the levels of contamination are acceptable and limited in area. The areas unaffected by Versatile's sampling activities are uncontaminated.

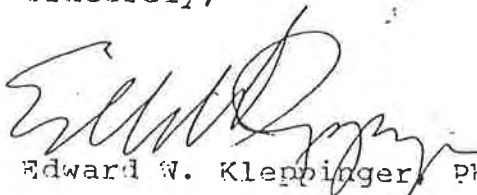
The attached table reflects the result of the analyses of "split" samples. As can be seen, there is little correlation. Given the problems noted earlier, this is not surprising.

The sampling does demonstrate that under some areas of the asphalt, there are PCBs. The studies at the site confirm that the site does not represent a risk to the public health and the environment. Each route of potential exposure and release is analyzed as follows:

- Fire and Explosion - Not possible.
- Air Emissions - Not possible, all PCBs under an asphalt cover. PCBs are not volatile.
- Surface Water - Site is completely curbed and covered. There is no run off to surface waters.
- Ground Water - Testing shows no groundwater immediately under the site. Testing shows no evidence of non-aqueous phase liquids which could migrate down to groundwater. The on-site well shows no sign of contamination. With the impermeable cover there is no infiltration to carry contamination, even if PCBs were soluble in water.
- Direct contact. The site is fenced and guarded so there is no public access to the site. Even employees at the site do not have any direct contact based upon the background testing showing the asphalt to be free of PCBs.

Due to the fact that there is on-going litigation between Versatile and Metal Bank, my client has requested that I ask EPA to consider the information supplied by Versar and EWK Consultants confidential under the provisions of the Toxic Substances Control Act. The pages containing this information have been marked confidential.

Sincerely,


Edward W. Kleppinger, Ph.D.